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October 15, 2024

BY ECF

Hon. Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square – Courtroom 705
New York, New York 10007

**Re: IN RE: COLUMBIA COLLEGE RANKINGS ACTION
(1:22-cv-05945-PGG (consolidated with 1:22-cv-06567-PGG))**

Dear Judge Gardephe:

Defendant Board of Trustees of Columbia University (“Defendant”) submits this letter in accordance with Your Honor’s rules governing communications with the Court.

We write this letter with consent of Plaintiffs’ counsel to provide a status update ahead of the case management conference on Thursday, October 17, 2024, at 10:00 a.m. *See* ECF No. 81.

The parties have agreed to mediate Plaintiffs’ claims with Judge Diane Welsh of JAMS. The mediation is scheduled for January 21, 2025. In the meantime, the parties have commenced discovery. Both parties have responded to interrogatories, and Defendant has begun producing documents in response to fourteen (14) categories that Plaintiffs deemed high priority in advance of mediation. Plaintiffs have also noticed a 30(b)(6) deposition of Defendant, served deposition notices for seven (7) employees of Defendant, and served a non-party subpoena on U.S. News & World Report seeking a document production and testimony.

In light of the agreement to mediate, the parties would like to address the case schedule. Specifically, the fact discovery cut-off is January 13, 2025. Defendant believes that the parties’ resources and judicial economy would be best served by focusing discovery in advance of mediation on the aforementioned high priority requests and certain limited document requests that Defendant intends to serve on Plaintiffs, while holding further document production and all party depositions in abeyance pending the outcome of the mediation. We understand that Plaintiffs do not oppose Defendant’s position, but are otherwise prepared to continue discovery if the Court deems it advisable. Defendant is prepared to file a written application seeking to modify the case schedule accordingly.

We look forward to seeing Your Honor on October 17, unless the Court finds that a status conference is unnecessary in light of this status update.

Sincerely,

/s/ Maura K. Monaghan

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